



MEMO ENDORSED

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March 9, 2020

By ECF

Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Lori Gjenashaj, et al. v. City of New York, et al.*, 19 Civ. 4142 (WHP) (GWG)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York and assigned to represent defendants in the above-referenced matter. In that capacity, I write to respectfully request an adjournment of the telephone conference currently scheduled for March 13, 2020 at 10:30 a.m. Plaintiff consents to this request, which is the first of its kind.

As the Court is aware, there is a telephone conference scheduled for March 13, 2020 at 10:30 a.m. to discuss defendants' pre-motion conference letter. ECF Nos. 59, 64, 65. Defendants now seek an adjournment of that telephone conference. The reason for this request is that defense counsel will be at previously-scheduled office-wide training for the majority of the day—including the time that the telephone conference is scheduled—on March 13, 2020. The parties have conferred and would both be available for a telephone conference on the morning of March 16, 2020 or the morning of March 17, 2020.

Therefore, defendants respectfully request that the telephone conference currently scheduled for March 13, 2020 at 10:30 a.m. be adjourned to one of the above-mentioned times or any other time convenient for the Court.

Thank you for your consideration herein.

Application granted. The pre-motion conference on March 13, 2020 will be rescheduled to March 16, 2020 at 2:30 P.M. Defendants' counsel shall make all arrangements for the conference call and inform opposing counsel and this Court of the dial-in information at least two hours in advance of the call.

Respectfully submitted,

Brachah Goykadosh
Senior Counsel
Special Federal Litigation Division

SO ORDERED:

Dated: March 11, 2020
New York, New York

WILLIAM H. PAULEY III
U.S.D.J.